

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al*,

Debtors.<sup>1</sup>

PROMESA  
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**MOTION IN COMPLAINECE WITH ORDER**

**To the Honorable United States District Court Judge Laura Taylor Swain:**

COMES NOW, Estrella LLC as Local Counsel to Brown Rudnick, LLP, Special Claims Counsel for the Financial Oversight and Management Board for Puerto Rico, as representative of the Commonwealth of Puerto Rico, Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Electric Power Authority (collectively, the “Debtors”), and for its motion in compliance with Order, respectfully request that this Honorable Court issues an Order approving its Ninth Interim Fee Application (the Application) for the following reasons:

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801).

1. On March 24, 2022, pursuant to this Court’s Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [ECF No. 3269] (the “Interim Compensation Order”), Estrella LLC as Local Counsel to Brown Rudnick, LLP, Special Claims Counsel for the Financial Oversight and Management Board for Puerto Rico, as representative of the Commonwealth of Puerto Rico, Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Electric Power Authority (collectively, the “Debtors”), filed its Ninth Interim Fee Application of Estrella, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Advisor for the Financial Oversight and Management Board for Puerto Rico, for the Period June 1, 2021 through September 30, 2021 (the “Application”), at ECF No. 20441. Together with its Notice of Filing at ECF No. 20442.

2. Thereafter, on March 30, 2022, this Court issued an Order directing compliance with the required disclosures pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82 (PRADA), 48 U.S.C. §2878(c), where it referred to the prior Order entered on March 21, 2022 at 20419. See EFC No. 20467.

3. In compliance with that Order, on May 16, 2022, Estrella, LLC filed its disclosures pursuant to PRADA and this court’s order at ECF No. 20467. See ECF No. 20835. Moreover, Estrella, LLC submitted amended disclosures pursuant to PRADA on May 24, 2022 at ECF No. 20945. Therefore, Estrella, LLC has complied with its required disclosure under PRADA.

4. Having complied with the directive of this Honorable Court, pursuant to ECF No. 20467, Estrella will refile the March 24, 2022 application with the Court for approval. The total

face value of the amount sought to be avoided and recovered in the Adversary Proceeding is \$22,832,431.

Dated: June 24, 2022

/s/ Kenneth C. Suria

**ESTRELLA, LLC**

Kenneth C. Suria (USDC-PR 213302)  
Alberto Estrella (USDC-PR 209804)  
Carlos Infante (USDC-PR 301801)  
P. O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Tel.: (787) 977-5050  
Fax: (787) 977-5090  
ksuria@estrellallc.com  
agestrella@estrellallc.com  
cinfante@estrellallc.com

*Local Counsel to the Special Claims Committee of the Financial Oversight and Management Board, acting by and through its members*